

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW MEXICO

LEO PACHECO,

Plaintiff,

v.

1:20-cv-00146 SMV-JHR

THOMAS ALLEN, MOLTZ CONSTRUCTORS
INC and ZURICH AMERICAN INSURANCE
COMPANY,

Defendants.

**SECOND MOTION FOR EXTENSION OF TIME TO RESPOND TO
MOTION TO REMAND**

COMES NOW Defendants Thomas Allen and Moltz Constructors, Inc. (hereinafter “Defendants”), by and through their counsel, Guebert Gentile & Piazza, P.C. (Terry R. Guebert and Anne L. Kemp), and hereby request an extension of time to respond to the Motion to Remand. As grounds therefore, Defendants state:

1. Plaintiff Leo Pacheco’s Motion to Remand was filed on March 23, 2020.
2. Pursuant to the Local Rules of Civil Procedure, a Response was due by April 6, 2020.
3. On April 6, 2020, Defendants’ filed their first Motion for Extension of Time to Respond to Motion to Remand.
4. An extension was granted by the Court until April 10, 2020.
5. Counsel for Defendants are attempting to contact their clients.
6. In light of the foregoing and taking into consideration the ongoing COVID-19 crisis, Defendants respectfully request an extension of time until April 14, 2020.

7. Counsel for Zurich joins in this request.

8. Counsel for Plaintiff does not oppose an extension of time until April 14, 2020.

WHEREFORE, for the foregoing reasons, Defendants respectfully request an extension of time until April 14, 2020 to file a Response to the Motion to Remand.

Respectfully submitted,

GUEBERT GENTILE & PIAZZA P.C.

By /s/ Anne L. Kemp
Terry R. Guebert
Anne L. Kemp
P.O. Box 93880
Albuquerque, NM 87199-3880
(505) 823-2300
tguebert@guebertlaw.com
akemp@guebertlaw.com
*Attorneys for Thomas Allen and
Moltz Constructors Inc*

I HEREBY CERTIFY that on the 10th day of April, 2020, I filed the foregoing Second Motion for Extension of Time to Respond to Motion to Remand was filed electronically through the CM/ECF system, and that I caused a copy of the same to be served by email to:

Sean M. FitzPatrick
FitzPatrick Law, LLC
4801 All Saints Rd. NW
Albuquerque, NM 87120
(505) 400-0420
sfitzpatrick@fitzpatricklawllc.com

AND

Kenneth H. Stalter
Stalter Law
4801 All Saints Rd NW
Albuquerque, NM 87102
(505) 315-8730
ken@stalterlaw.com

Attorney for Plaintiff

Lucas Frank
Moses Dunn Farmer & Tuthill, P.C.
PO Box 27047
Albuquerque, NM 87125
(505) 843-9440
lucas@moseslaw.com
Attorney for Defendant Zurich

/s/ Anne L. Kemp
Terry R. Guebert
Anne L. Kemp
Attorneys for Thomas Allen and Moltz Constructors Inc